

EXHIBIT E



Consumer Financial
Protection Bureau

Start a new complaint
(<https://www.consumerfinance.gov/>)

◀ All complaints (.)

230710-11495677

OPEN

✓ Submitted

STATUS

Submitted to the CFPB on 7/10/2023

PRODUCT

Money transfer, virtual currency, or money service

ISSUE

Fraud or scam

We received your complaint. Thank you.

We will review your complaint. Depending on what we find, we will typically:

- Send your complaint to the company for a response; or
- Send your complaint to another state or federal agency, or help you get in touch with your state or local consumer protection office; or
- Let you know if we need more information to continue our work.

YOUR COMPLAINT

On 1/21/2021 PayPal Reputation Manager, Kim Eichorn, sent out a press release to the mainstream media stating that PayPal had "booted" me from their services and falsely accused me of violating their policies. This fact was untrue. She was discriminating against me because of my political beliefs, as the company does not cancel those who are not Christians or Conservative politically. This is a violation of my Constitutional Rights, as well as a violation of Federal Law and PayPal's own Privacy Policies. PayPal's agent contacted CBS News, The Washington Post, The New York Post, NBC to share my private financial information. This personal information was shared broadly throughout the mainstream media and all over the internet. My private financial information went viral and became world headline news in 1 hour. My fundraising efforts were destroyed and the world was calling me a con artist, grifter and it was humiliating and mortifying to see my name in national headlines like this: "Real Estate Agent, Jenna Ryan Booted From PayPal for Violating Fundraising Policies." This destroyed my reputation, I had to close my business and change my name. The next day after this happened, my office in Frisco kicked me out due to publicity. All of my businesses were destroyed. I was heckled in public. I was shunned by vendors and contractors and clients. The next day I was also canceled from all social media accounts, including Facebook and Instagram, where I have been a social media Influencer for 15+ years. This created a cascade of cancellations and brands that canceled me publicly, including iHeartMedia. It was and still is a nightmare. I ended up filing suit in Federal Court against PayPal in an attempt to stay out of arbitration, due to the expense of arbitration, and because I wanted to go before a jury of my peers. The Judge ruled that my case must go to arbitration, therefore, because I clicked a button to "accept" PayPal one time in 2006, Paypal has the right--for the rest of my life--eternally to require that I go to arbitration no matter what they do to me. Even though PayPal canceled the contract, I am forever tethered to this horrible arbitration agreement. I tried as hard as I could to find representation for the arbitration, however, no attorney will take my

case for less than \$350,000. And, they tell me that it will be hard to win because arbitrators traditionally rule in favor of the big corporation in order to get repeat business. I do not have \$350,000 to take up for myself against this billion dollar corporation. This has caused me enormous effort, expense, energy and left a trail of turmoil, hurt and financial damages. I have tried to settle with PayPal, but they are adamant that they did nothing wrong when they shared my financial information with the press and lied about me violating their policies, and discriminated against me for my political views. I will not rest until this matter is resolved. PayPal needs to pay for the damages they've caused, as well as be punished for violating the law and their own contract with me--and prohibited from putting people in life long, eternal arbitration agreements, regardless of what PayPal does to harm consumers. This is unfair and I need formal resolution through a higher power in the United States Government. This cannot stand.

ATTACHMENTS

[ECF NO 9 Amended Complaint.pdf \(1 MB\)](#)

[ECF No 25 Order granting motion to compel arbitration.pdf \(540.4 KB\)](#)

View full complaint 

 Sent to company

STATUS

Sent to company on 7/10/2023

We've sent your complaint to the company, and we will let you know when they respond.

Their response should include the steps they took, or will take, to address your complaint.

Companies generally respond in 15 days. In some cases, the company will let you know their response is in progress and provide a final response in 60 days.

✓ Company still working

STATUS

Company response is in progress as of 7/24/2023

The company has responded that it is still working on your issue

In some cases, companies need more time to respond. You should receive a final response within 60 days from the date we sent your complaint to the company.

COMPANY'S INTERIM RESPONSE

The issues raised in this complaint are still being researched.

EXHIBIT E

KEN PAXTON
ATTORNEY GENERAL OF TEXAS

Complaint Summary

Name of person you dealt with	Robert C. Vartabedian
How did you first come into contact with this business or individual?	Other
If other, please specify.	Through recommendation on partner websites.
If you responded to a solicitation in another language, which?	

Where did the transaction take place	Over the computer
If other, please specify	

Transaction Date	1/21/2021
Please describe your complaint in detail	<p>On 1/21/2021 PayPal Reputation Manager, Kim Eichorn, sent out a press release stating that PayPal had canceled my account for violating fund raising policies. This fact was untrue. She was discriminating against me because of January 6th and she only allows Liberals to do fundraising for BLM, not Conseratives.</p> <p>PayPal's agent contacted CBS News, The Washington Post, The New York Post, NBC and sent out a press release regarding my private financial information in violation of their own privacy policies (DTPA) and in violation of federal law.</p> <p>My private financial information went viral and became world headline news in 1 hour. My fundraising efforts were destroyed and the world was calling me a con artist, grifter and it was humilitating and mortifying to see my name in national headlines like this: "Real Estate Agent, Jenna Ryan Booted From PayPal for Violating Fundraising Policies." This destroyed my reputation, I had to close my business and change my name.</p> <p>The next day after this happened, my office in Frisco kicked me out due to publicity. All of my businesses were destroyed. I was heckled in public. I was shunned by vendors and contractors and clients. The next day I was also canceled from all social media accounts, including Facebook and Instagram, where I have been a social media influencer for 15+ years. This created a cascade of cancellations and brands that canceled me publicly, including iHeartMedia. It was a nightmare.</p> <p>I ended up filing suit in Federal Court against PayPal in an attempt to stay out of arbitration, due to the expense of arbitration, and because I wanted to go before a jury of my peers. The Judge ruled that my case must go to arbitration,</p>



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This has caused me enormous effort, expense, energy and left a trail of turmoil, hurt and financial damages. I have tried to settle with PayPal, but they are adamant that they did nothing wrong when they shared my financial information with the press and lied about me violating their policies, and discriminated against me for my political views.

I will not rest until this matter is resolved. PayPal needs to pay for the damages they've caused, as well as be punished for violating the law and their own contract with me--and prohibited from putting people in life long, eternal arbitration agreements, regardless of what PayPal does to harm consumers. This is unfair and I need formal resolution through a higher power in the Texas Government. This cannot stand.

Have you complained to the business or individual?	Yes
If Yes, when?	8/9/2022
What was the business' or the individual's response?	CIVIL ACTION NO 4:22-cv-559 The case is pending arbitration which is costly and beyond my ability to pay.

Did you sign a contract?	Yes
How much did the company/individual originally ask you to pay?	\$20.00
How much did you actually pay?	\$20.00
Method of Payment	DEBIT
Date of Payment	1/21/2021

Have you contacted another agency or attorney about this complaint?	Yes
If yes, please list name and address of the agency or	Robert C. Vartabedian Partner ALSTON & BIRD 301 Commerce Street, Suite 3635 Fort Worth, TX 76102



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

attorney?	+1 682 354 2003 (O) +1 510 325 8516 (M) Rob.Vartabedian@alston.com
What action was taken by this agency or attorney?	Argued to force me into arbitration that is usurious, expensive and out-of-reach due to their smear campaign, financial ruin and cost to fight a billion dollar company.